



**Sub-Surface Informational
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**We service New England & New York State
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"Your Ground Penetrating Radar Company"



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January 4, 1999

**Ms. Magalie Roman Salas
Office of the Secretary
Federal Communication Commission
1919 M Street NW, Room 222
Washington, DC 20554**

Dear Ms Salas,

Today I became aware off the FCC's "Notice of Inquiry" regarding Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission System (FCC 98-208, ET Docket # 98-153) All of us are particularly concerned with the discussion in paragraph 7 which mentions the new developments of ground penetrating radar. Our company uses ground penetrating radar (GPR) for a multitude of subsurface applications. This science has been tested for over 25 years to be a very accurate and effective tool for not only the environment but, for a multitude of geotechnical applications as well as mine detection, unexploded ordinance, forensic investigations, underground storage tank locations to name a few. Our service is used by engineers, scientists, geologists, geophysicists and military throughout the entire globe.

Our signal is radiated "into" the ground under a "controlled" setting. I personally know of no incident where it caused interference with any communications signals or radio, TV, airplanes, etc. I have contacted several GPR professionals who have been in the profession longer than I (and that's 11 years) and all attest to the same conclusion. Our company has performed a multitude of GPR surveys without one incident. The GPR signal radiated into the subsurface just does not affect other transmissions.

Sub-Surface Informational Surveys, Inc. and the entire industry of GPR users are totally opposed to the newly proposed regulations. It certainly would defeat the purpose and making it very inexpensive and totally effective. I know of no other tool that can give the overwhelming results to give us a safe living and working environment for all of humanity.

Please, do not impose these rules on our industry.

Respectfully,


**Paul H. Bacon, Jr.
President**

"LET US SEEK AND FIND"

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